

April 15, 2002

Via Electronic Filing

Mr. William Caton  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: CC Docket No. 94-102  
ALLTEL Corporation  
Fifth Quarterly Report on  
TTY/Digital Deployment

Dear Mr. Caton:

On behalf of ALLTEL Corporation, and its various subsidiaries and affiliates providing digital CMRS services ("ALLTEL"), I transmit its fifth quarterly report on the status of its efforts to implement TTY compatibility in its digital network pursuant to the requirements of the Fourth Report and Order<sup>1</sup> in the above-referenced matter. ALLTEL has monitored the efforts of the TTY Forum and regularly communicated with its network and handset vendors as to the status of the development of TTY compatible digital technology.<sup>2</sup> Based upon the information obtained, the implementation efforts expended, and the current representations of its vendors, upon which it must ultimately rely, ALLTEL believes that TTY/digital compatibility can be implemented in its network by the Commission's mandated deadline.

Except as updated below, the information contained in ALLTEL's prior Quarterly Reports remains accurate and is incorporated by reference into the instant filing.

ALLTEL has completed testing the TTY function on its Motorola switches and has completed inter-carrier testing for these switches of the TTY function as part of the ATIS/TTIS group. These test results have been logged for recording purposes and for further study and carrier coordination. With respect to its Nortel and Lucent switches, internal testing of the basic TTY function has been initiated and will be completed by the end of April 2002. ALLTEL is currently coordinating network wide testing of the TTY function, which should be completed well in advance of the Commission's implementation deadline.

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<sup>1</sup> In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Calling Systems, Fourth Report and Order, CC Docket No. 94-102, FCC 00-436 (released December 14, 2000) ("Fourth Report and Order").

<sup>2</sup> ALLTEL notes that many of its vendors actively participate in the TTY Forum and have submitted reports on the status of the implementation of TTY compatible digital solutions.

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ALLTEL has been apprised that an issue may be emerging as to whether the TTY equipment maintained by the PSAPs is sufficiently compatible with the various switch vendor's TTY solutions to ensure reception of communications with an acceptable error rates. ALLTEL is monitoring the matter closely along with industry through ATIS/TTIS.

Please contact the undersigned should you require any additional information.

Respectfully submitted,

Glenn S. Rabin  
Vice President  
Federal Regulatory Affairs